

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Labrell Ray Jones

Case No. 2:21-mj-30305  
Judge: Unassigned,  
Filed: 06-17-2021

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 11, 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(g)(1)

*Offense Description*  
Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: June 17, 2021

City and state: Detroit, Michigan



*Complainant's signature*

Special Agent Victor Mota, A.T.F.

*Printed name and title*



*Judge's signature*

Hon. Patricia T. Morris, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Special Agent Victor A. Mota, being sworn, depose and state the following:

**I. INTRODUCTION**

1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, and have been so employed since March 2020. I am currently assigned to the Detroit Field Division, group VII. I am tasked with investigating violations of firearms and narcotics laws. Prior to becoming a Special Agent with ATF, I was an Officer with the United States Customs and Border Protection Office of Field Operations for ten years as well as a supervisor for about two years. I completed the United States Customs and Border Protection Basic course in Brunswick, Georgia, the Criminal Investigator Training Program in Brunswick, Georgia, and the ATF Special Agent Basic Training at the Federal Law Enforcement Training Center in Brunswick, Georgia. I obtained a Bachelor of Science degree in Criminal Justice from Wayne State University.

2. During my employment with ATF, I have participated in criminal investigations focused on firearms, armed drug trafficking violations, and criminal street gangs. Through these investigations, my training and experience, and conversations with other agents and law enforcement personnel, I have become familiar with firearms violations.

3. I make this affidavit from personal knowledge based on my participation in this investigation, with exception of the matters expressly stated, which are based on information received from other law enforcement officials and/or their reports and records.

4. The information outlined herein is provided for the limited purpose of establishing probable cause and does not contain all details or facts that exist pertaining to the investigation.

5. I am currently investigating Labrell Ray JONES, date of birth xx/xx/1991, for possession of a firearm by a convicted felon, in violation of 18 U.S.C. § 922(g)(1).

## **II. SUMMARY OF THE INVESTIGATION**

6. On May 11, 2021, Detroit Police Department (DPD) Officers Deshun Greene and Cesar Quinonez were patrolling the area of Fenkell and Shaefer in Detroit, Michigan. Officers observed a black male, later identified as JONES, go into an alleyway of a gas station located in 13605 Fenkell, Detroit, Michigan. The officers drove next to the alleyway and observed JONES urinating in public.

7. As JONES turned his body towards the scout car, Officer Greene observed what appeared to be a handgun on JONES' right side. Officer Greene observed JONES tucking the handgun in his right pocket.

8. After JONES was done urinating, Officer Quinonez asked JONES to walk towards the scout car. JONES then turned towards Officer Greene. Officer Greene observed what appeared to be the handle of a firearm in JONES' right pocket. Officer Greene informed Officer Quinonez about the firearm in JONES' right pocket. At this point, JONES ran from the officers.

9. JONES ran through the gas station parking lot and pulled the firearm from his right pocket and tossed it onto the ground. Officer Greene observed JONES running south on Tracey Rd. from Fenkell Rd. Officer Greene unholstered his taser and informed JONES he (Officer Greene) would tase him. Officer Greene and Officer Quinonez followed JONES to the backyard/alleyway between Tracey and Lesure Rd. where JONES was observed attempting to hide behind parked vehicles. Officer Greene ordered JONES to get on the ground or he would be tased. At this juncture, JONES complied with Officer Greene's command and laid on the ground. JONES was detained by Officer Greene and Officer Quinonez in the alleyway between Tracey Rd. and Lesure Rd.

10. As Officer Greene walked JONES back to the scout car, Officer Quinoz informed Officer Greene that he recovered, from the location where Officer Greene had observed JONES toss the firearm, a Smith & Wesson (S&W), Military and Police (M&P) .45 caliber Shield semi-automatic pistol loaded with one round in the chamber, plus an additional 6 live rounds. JONES was transported to the Detroit

Detention Center (DDC). The recovered firearm was taken to the 11<sup>th</sup> precinct where it was held as evidence.

11. On June 12, 2021, I reviewed a National Crime Information Center (NCIC) computer printout regarding JONES' criminal history (CCH). The CCH revealed the following convictions:

- a. 2011 – 3<sup>rd</sup> Circuit Court Criminal Division: Pled guilty to Felony Controlled Substance Delivery /Manufacture – Ecstasy/MDMA.
  - For this crime, JONES was sentenced to 3 months in Jail and probation for 3 years.
- b. 2013 – 3<sup>rd</sup> Circuit Court Criminal Division: Pled guilty to Felony Home Invasion – 2<sup>nd</sup> Degree.
  - For this crime, JONES was sentenced to 14 months to 15 years in prison.
- c. 2016 – 6<sup>th</sup> Circuit Court: Pled guilty to 3 counts of Felony Financial Transaction Device - Possession of Fraudulent One.
  - For these crimes, JONES was sentenced to 16 months to 15 years in prison.
- d. 2017 – 3<sup>rd</sup> Circuit Court Criminal Division: Pled guilty to two counts of Felony Financial Transaction Device – Illegal Sale/Use.
  - For this crime, JONES was sentenced to 1 to 4 years in prison.

e. 2019 – 3<sup>rd</sup> Circuit Court Criminal Division: Pled guilty to Felony Controlled Substance – Possession.

- For this crime, JONES was sentenced to 6 months in jail.

12. The above-mentioned convictions establishes probable cause that JONES knew, at the time he possessed the firearm, that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year.

13. ATF Special Agent and Interstate Nexus Expert Michael Jacobs determined, based on a description but without physically examining the pistol, that the Smith & Wesson M&P .45 caliber pistol seized from JONES is a “firearm” as defined under Chapter 44, Section 921, and was manufactured outside the State of Michigan after 1898, therefore, traveling in or affecting interstate commerce.

### III. CONCLUSION

14. Probable cause exists that Labrell Ray JONES, having been previously convicted of at least one crime punishable by imprisonment for a term exceeding one year and having knowledge of his prohibited status, did possess a firearm that had previously traveled in or affected interstate commerce in violation of 18, U.S.C. § 922(g)(1).



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Victor A. Mota, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms, and Explosives

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



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HON. PATRICIA T. MORRIS  
UNITED STATES MAGISTRATE JUDGE